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***Attorneys for Defendant Motive Technologies, Inc.***

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

HALEY IP, LLC,

Plaintiff,

v.

MOTIVE TECHNOLOGIES, INC.,

Defendant.

Case No.: 4:23-cv-02923-HSG

**STIPULATION AND ORDER  
EXTENDING THE BRIEFING  
SCHEDULE REGARDING DEFENDANT  
MOTIVE TECHNOLOGIES, INC.'S  
MOTION TO DISMISS THE  
COMPLAINT PURSUANT TO FED.  
R. CIV. P. 12(b)(6)**

Hon. Haywood S. Gilliam, Jr.

Pursuant to Local Civil Rule 6-1(b) and 6-2, Plaintiff Haley IP, LLC (“Haley”) and Defendant Motive Technologies, Inc. (“Motive”) (collectively, the “Parties”) stipulate as follows:

WHEREAS, on August 18, 2023, Motive filed a Notice of Motion and Motion to Dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(6) (“Motion”). ECF No. 50. The Motion is currently noticed to be heard before Your Honor on November 9, 2023.

WHEREAS, due to prior commitments for both parties, the Parties agreed to extend the briefing schedule for the Motion as set forth below:

- September 15, 2023: Haley’s Opposition deadline (previously September 1, 2023); and
- September 29, 2023: Motive’s Reply deadline (previously September 8, 2023).

WHEREAS, the Parties do not seek to adjourn the current hearing date for the Motion, set for November 9, 2023.

WHEREAS, the Parties have previously agreed to extend Motive’s deadline to respond to the Complaint three times (ECF Nos. 42, 44, 46), but have not previously sought to amend this briefing schedule.

WHEREAS, the proposed revised briefing schedule for Motive’s Motion will not affect the rest of the schedule for the case.

NOW THEREFORE, pursuant to Civil L.R. 6-1(b) and 6-2, the Parties, through their respective counsel, hereby stipulate as follows:

The briefing schedule for Motive's Motion is extended as follows:

- September 15, 2023: Haley's Opposition deadline; and
- September 29, 2023: Motive's Reply deadline.

**IT IS SO STIPULATED AND AGREED.**

Dated: August 31, 2023

Respectfully submitted,

RAMEY LLP

/s/ Susan S.Q. Kalra  
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**FILER'S ATTESTATION**

I, Susan S.Q. Kalra, am the ECF user whose ID and password are being used to file this  
**STIPULATION AND [PROPOSED] ORDER EXTENDING THE BRIEFING  
SCHEDULE REGARDING DEFENDANT MOTIVE TECHNOLOGIES, INC.'S  
MOTION TO DISMISS THE COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(6).** In  
compliance with Civil L.R. 5-1(h)(3), I attest that all other signatories listed, and on whose  
behalf the filing is submitted, have concurred in the filing of this document.


Date: August 31, 2023

/s/ Susan S.Q. Kalra  
Susan S.Q. Kalra

**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: 9/5/2023

  
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HONORABLE HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT JUDGE